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VIA ECF

August 4, 2020

Honorable Leonie M. Brinkema
U.S. District Judge
Albert V. Bryan U.S. Courthouse
401 Courthouse Square
Alexandria, VA 22314

Re: Al-Suyid et al. v. Hifter et al., 1:20-cv-00170-LMB-JFA
U.S. District Court for the Eastern District of Virginia

Dear Judge Brinkema:

We represent the plaintiffs in the captioned case and write to briefly respond to the letter dated July 31, 2020 from Tucker Levin, PLLC, who apparently now represent defendant Khalifa Hifter.

Preliminarily, we note that no mention of co-defendants Khalid Hifter or Saddam Hifter is made in Tucker Levin's letter. It therefore appears that those two defendants remain unrepresented.

With respect to Tucker Levin's request that the Court "allow Gen. Hifter to enter these matters and respond substantively and procedurally to the complaints and Magistrate reports and recommendations," plaintiffs oppose that request at this late hour, based on the fact that the defendants were properly served (see Mag. Judge Anderson's Proposed Findings of Fact and Recommendations dated June 17, 2020 at pp. 6-7), and this case has received widespread media coverage, including in the middle east, from the date of filing in February. Plaintiffs would also oppose any motion to consolidate this case with the Elzagally case (1:19-cv-00853-LMB-MSN), as the only fact/issue common to the two cases is the allegation of violation of the TVPA by Khalifa Hifter.

We would therefore respectfully request that the Court deny the request from Tucker Levin and enter its decision and judgment in line with Magistrate Judge Anderson's Proposed Findings of Fact and Recommendations dated June 17, 2020.

Respectfully submitted,

/s/ Kevin Carroll
Kevin Carroll

/s/ Joseph G. Grasso
Joseph G. Grasso (admitted *pro hac vice*)

WIGGIN AND DANA LLP
Attorneys for Plaintiffs Muna Al-Suyid, et al.

cc: All Parties via ECF; Duncan P. Levin, Esq.; Edward Ungvasky, Esq.